

AFFIDAVIT

1. I am a United States Postal Inspector with the United States Postal Inspection Service, and have been so employed since July, 2004. I am currently assigned to the Kansas City Field Office of the Postal Inspection Service and have experience enforcing federal mail and drug laws. This affidavit is based on my own personal knowledge and information given to me by other Postal Inspectors and other law enforcement personnel.

2. I received basic training for approximately 12 weeks from the United States Postal Inspection Service regarding individuals using the United States Mail to transport controlled substances and proceeds from the sale of controlled substances as well as the use of Postal Money Orders to launder the proceeds of controlled substances. I received formal training for one week in January, 2009, when I attended the United States Postal Inspection Service Narcotics training course in Potomac, Maryland. This training involved narcotic investigation techniques, chemical field testing, and training in the identification and detection of controlled substances and narcotic proceeds being transported in the United States Mail and other commercial carriers.

3. The U. S. Postal Inspection Service has implemented a parcel profile program targeting parcels mailed to and from areas of the United States which have been identified by law enforcement as being source areas for the distribution of controlled substances. The Kansas City Field Office Postal Inspection Service program consists of reviewing postal service records and a physical profile of Express and Priority Mail parcels and envelopes which have originated from and/or have been received for delivery in the District of Kansas and Western District of Missouri.

ITEM TO BE SEARCHED AND ITEMS TO BE SEIZED

4. This affidavit is made in support of an application for a search warrant for a United States Postal Service ("USPS") Priority Mail Parcel, bearing tracking number "9505515058719302289981," addressed to "Steven Rector, 45 Wilson Ave #7, Vallejo, CA 94590" with a return address of "Douglas Shulte, 510 Splitlog Ave, Kansas City, KS 66101" that was mailed on October 29, 2019, from Kansas City, Missouri Post Office 64108. Further, this parcel weighs approximately 9 ounces and bears \$7.35 in postage ("Subject Parcel").

5. Items to be seized from the Subject Parcel include: controlled substances, including marijuana, cocaine, methamphetamine and heroin; any drug paraphernalia; any currency related to the possession or distribution of a controlled substance; and any narcotic-related packaging.

6. The Subject Parcel warrant will be executed at the Kansas City, Missouri Interdiction Office located at an undisclosed location in Kansas City, Missouri, which is in the Western District of Missouri.

OFFENSES UNDER INVESTIGATION

7. Based on my training and experience and on the facts set forth in this Affidavit, I believe the Subject Parcel contains evidence of violations of Title 21, United States Code, Section 841(a)(1) (possession with intent to distribute a controlled substance), Title 21, United States Code, Section 846 (attempts and conspiracies to do the same), and Section 843(b) (unlawful use of a communications facility to facilitate the commission of the above narcotics offenses).

PROBABLE CAUSE

8. On October 30, 2019, Inspectors identified a suspicious parcel online from Kansas City, Missouri to Vallejo, California. I identified that the Subject Parcel, United States Postal Service ("USPS") Priority Express Mail Parcel, bearing tracking number "9505515058719302289981," addressed to "Steven Rector, 45 Wilson Ave #7, Vallejo, CA 94590" with a return address of "Douglas Shulte, 510 Splitlog Ave, Kansas City, KS 66101" was mailed on October 29, 2019, from Kansas City, Missouri Post Office 64108. Further, this parcel weighs approximately 9 ounces and bears \$7.35 in postage ("Subject Parcel"). I had the parcel routed to my office in Overland Park and it arrived on November 2, 2019.

9. Based on my training and experience, I know there are common characteristics used by individuals who traffic in illegal controlled substances via the U.S. Mail. The Subject Parcel contained several of these characteristics, including:

- a. The Subject Parcel was mailed to a known illegal drug source distribution area (i.e., California).
- b. The Subject Parcel is similar in size and weight of previously seized parcels containing illegal narcotics or U.S. Currency.
- c. The Subject Parcel's postage was paid with cash.

10. I queried the Subject Parcel's listed return address information (Douglas Shulte, 510 Splitlog Ave, Kansas City, KS 66101) in the CLEAR Law Enforcement Database as well as the U.S. Postal Service Address Management System. Shulte was not found to reside at this address. I also queried the addressee information (Steven Rector, 45 Wilson Ave #7, Vallejo, CA 94590) in the CLEAR Law Enforcement Database and Steven was not identified as being associated to the address but an Anne Rector was listed at the address.

11. On November 4, 2019, I contacted Kansas City, Missouri Police Detective Antonio Garcia and coordinated an exterior odor search of the Subject Parcel at the FedEx office, located at 6098 Front Street, Kansas City, Missouri. I placed the Subject Parcel in the garage area, where other similar empty boxes and envelopes were located. At approximately 9:30 am, I observed Detective Garcia and his certified narcotic detecting canine, Zina, search the area. Upon searching the area, Zina sat, facing the Subject Parcel. Detective Garcia stated Zina's actions indicated she had alerted to the Subject Parcel as containing a narcotic odor.

12. According to Detective Garcia, Zina is a nine year old, German Shepherd. Zina's last certification by the Kansas City, Missouri Police Department was on April 17, 2019. Zina is trained to detect the odors of cocaine, marijuana, heroin, and methamphetamine. Since being certified, Zina has recovered 9,850.4 pounds of marijuana, 627.8 pounds of methamphetamine, 183.3 pounds of cocaine, 29,552 Ecstasy tablets, 194.2 pounds of heroin, and \$5,357,523.00 in U.S. Currency.

CONCLUSION


13. Therefore, based on these facts, I believe there is probable cause to believe that the Subject Parcel contains evidence of a crime, in violation of Title 21, United States Code, Section 841(a)(1), (possession with intent to distribute a controlled substance), Title 21, United States Code, Section 846 (attempts and conspiracies to do the same), and Title 21, United States Code, Section 843(b) (unlawful use of a communications facility to facilitate the commission of the above narcotics offenses).

FURTHER YOUR AFFIANT SAYETH NOT.



Paul Shade
United States Postal Inspector
United States Postal Inspection Service

Sworn to and subscribed before me on this 5th day of November 2019.



HONORABLE JOHN T. MAUGHMER
United States Magistrate Judge